Washington State Department of Health
Wastewater management Program

LOCAL MANAGEMENT PLAN GUIDANCE WORKSHOP

MEETING SUMMARY
July 19, 2006
PUBLIC HEALTH SEATTLE- KING COUNTY EASTGATE
DRAFT

ATTENDEES:

NAME	LOCAL HEALTH JURISDICTION
Keith Grellner	Kitsap
David Norman	Department of Health (DOH)
Scott Kellogg	DOH
Larry Fay	King
Tom Gibbs	Thurston
Art Starry	Thurston
Steve Petersen	Thurston
Rich Olliver	Snohomish
Bruce Staughn	Snohomish
Greg Bishop	King
Terri Jenkins-McLean	King
Liz Maier	Clallam
Andy Brastad	Clallam
Jerry Deeter	Kitsap
Jim Goode	Whatcom
John Wolpers	Whatcom
Corinne Story	Skagit
Linda Atkins	Jefferson
Larry Kirchner	DOH
Jane C. Lee	DOH
Debbie Riley (by phone)	Mason
Lorna Larsen	DOH

The purpose of this workshop was for LHJ staff from the 12 Puget Sound counties to exchange information, ideas and experiences as they begin to develop their local on-site management plans.

Part 1 Database Enhancement

The LHJs asked what data elements they will need to maintain as part of the merging of OSS data for a regional or state assessment. The following list of key data elements for all OSS was developed:

1) Number of OSS in the jurisdiction, by known/unknown/assumed.
2) Age of the system (need to agree what this date is)
3) Location (by parcel number)
4) Number of failures (Include type of failure, reason, type of OSS)

5) Number of repair permits (annual)
6) Number of inspections, by whom (per what – surveys, whole etc)
7) Type by technology (Need to agree on the groups; mound, atv, gravity, etc)

Advantages of common data elements include:

- Consistent information can describe OSS management regionally.
- A regional view might be better able to secure funding.
- Legislative inquiries regarding regional OSS management can be addressed
- Areas of increased risks across the region can be identified

Discussion of the elements:

- The ratio of known to unknown systems will help in resource discussions
- The "assumed" category is to differentiate between clear information and "best guess" information.
- Locations of unknown/assumed OSS is used to focus management efforts.
- Each plan should describe how the known/unknown/assumed data were derived.
- Data on OSS type may be useful in targeting educational material.
- Information in the LHJ Plan including maps should be simple.
- The Key Elements are minimums; the LHJs may want to record additional data on each system as part of their overall management program.

Issues involved with record keeping and data analysis:

- OSS records are in a variety of formats (paper, micro fiche, etc) and converting old records to new electronic data base is an ongoing resource issue
- OSS data needs to be reported by parcel number. Some counties are further ahead than others using parcel numbers.
- Caution was advised when generating maps, particularly of failing systems or repair permits. The data may be misinterpreted.
- Concern was expressed over focusing on the "bean counting," i.e. detailed data analysis, rather than focusing on the impacts on public health.
- Guidance was requested to develop criteria to investigate unknown OSS
- Guidance was requested to define compliance.
- Assistance is requested defining what conditions constitute failure.
- Criteria is needed to determine how an unknown or assumed OSS becomes known
- A regionally consistent definition of "inspection" will ensure that counties' O&M programs are consistent.
    - Is a tank pumping a form of inspection?
    - Data field for inspection reports and another one for pumping.

Part 2 Sensitive Areas

Sensitive Areas

- A strategy for defining sensitive areas:
    - Overlay planning maps, Critical Aquifer Recharge Areas, shellfish growing areas, 303(d) listed water, etc.

- To assist in the determination of priority areas, the committee assigned the following values (2 low to 4 high) based on public health risk for each sensitive area. These values can be used as multipliers to help determine area risk when overlaying sensitive area maps:

Description	Points
a. Shellfish protection districts or shellfish growing areas	4
b. Sole source aquifers designated by the U.S. EPA	2
c. Critical Aquifer Recharge	3
d. Designated wellhead protection areas	3
e. Up gradient areas directly influencing water recreation facilities	2
f. Special protection areas	2
g. Wetland areas producing crops for human consumption	3
h. Frequently flooded areas	3
i. Areas where nitrogen is a contaminant of concern In ground water	4
i. Areas where nitrogen is a contaminant of concern In marine water	2

- Coordinating with local planning entities is critical.

The LHJs need information on how to identify marine areas where nitrogen is a contaminant of concern.

Part 4 MRA determinations, boundaries and the on-site strategy

MRAs

- LHJs have trouble determining when the OSSs may be contributing significantly to concern with problems in the marine environment.
- Snohomish County has conducted a surface water study on the source of coliform bacteria in a marine area. With DNA analysis, the source was determined not to be human. In this case, there is no need to form an MRA for concerns with OSSs.
- Guidance was asked to better define what additional O&M is needed in an MRA?

Part 3 O&M in Sensitive Areas

- Several jurisdictions plan to have O&M requirements consistent throughout the jurisdiction (beyond the MRA)
  - This will prevent missing sensitive areas
  - Requires an assessment of the adequacy of existing O&M requirements
  - Will be easier to implement
  - Sensitive areas will get priority from the LHJ for education and enforcement activities.
- Request help defining effective O&M

Part 5

Education

- The limiting factor are resources, this is heard across all jurisdictions.
- The counties can generate mailing lists, but can not pay for postage, printing, etc or other outreach activities.
- King County's education efforts are behavior based
  - Identify why people are acting the way they are

- Then develop educational materials (various mediums) based on their thinking
- Fill information gaps

Enforcement

- In the Henderson Watershed Protection Area, a Citizen Advisory Committee came up with an O&M plan. Fees will be collected with the property taxes. Plan will be implemented over the next 3 years.
- Enforcement activities can occur
  - When owners apply for permits
  - At time of sale
- The Whatcom County Public Health Advisory Board wants the State disclosure form to be changed to reflect O&M compliance.
- Kitsap County has spent $150,000 for active enforcement on about 8,000 alternative systems. This represents only about 10% of the OSS in the jurisdiction.

Funding

- DOH will report LHJ program funding needs in the December 2008 report to the legislature. - DOH will be better able to advocate for LHJs if they have a clear idea of what the LHJs need.
- The Plan will describe the present circumstances, the ideal circumstances, and the resources that are needed to reach the ideal.
- Funds are most likely to be targeted at the designated sensitive areas.

Part 6 The Plan

Drafting the Plans:

- Plan should be short (15 pages with map appendices) and useable.
- Relationship of the Plans to the Local Rules:
  - Regulations will define requirements
  - Plan will provide details of implementation
- Clallam County is hiring a consultant to write the plan via public process
- Whatcom and other counties will write the plan in house and present a draft at a public meeting.

Next Steps:

- DOH was asked to work on developing a central repository of water recreation water quality data. (Although this is beyond the scope of the project).
- DOH was asked to prepare a PowerPoint presentation showing the key points of the guidance, and include where the requirements come from, i.e. rules, law, etc. This will be helpful to share with local boards of health and others.
- Group asked to meet in September with the main agenda topic being Marine Recovery Areas